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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2010-237

12 **DEBORAH ANN PARNELL,**  
13 **a.k.a. DEBORAH A. PARNELL,**  
14 **a.k.a. DEBORAH PARNELL,**  
15 **a.k.a. DEBORAH ANN DAVIS,**  
3226 Chestnut Drive  
Flossmoor, IL 60422

**A C C U S A T I O N**

16 Registered Nurse License No. 674904

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, ("Complainant") brings this Accusation solely in her  
22 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"  
23 Department of Consumer Affairs.

24 2. On or about March 2, 2006, the Board issued Registered Nurse License  
25 Number 674904 to Deborah Ann Parnell, also known as Deborah A. Parnell, Deborah Parnell  
26 and Deborah Ann Davis ("Respondent"). Respondent's registered nurse license was in full fc  
27 and effect at all times relevant to the charges brought herein and expired on June 30, 2007.

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### STATUTORY PROVISIONS

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3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

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4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

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5. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct. . .

....

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

(b) Procuring his or her certificate or license by fraud, misrepresentation, or mistake.

....

(f) Conviction of a felony or of any offense substantially related to the qualifications, function, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

6. Code section 2762, subdivision (a), states:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

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3 (a) Obtain or possess in violation of law, or prescribe, or except  
4 as directed by a licensed physician and surgeon, dentist, or podiatrist  
5 administer to himself or herself, or furnish or administer to another, any  
6 controlled substance as defined in Division 10 (commencing with Section  
7 11000) of the Health and Safety Code or any dangerous drug or dangerous  
8 device as defined in Section 4022.

9  
10 7. Code section 4060 states, in pertinent part:

11 No person shall possess any controlled substance, except that furnished to  
12 a person upon the prescription of a physician, dentist, podiatrist, optometrist,  
13 veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished  
14 pursuant to a drug order issued by a certified nurse-midwife pursuant to Section  
15 2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant  
16 pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or  
17 a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause  
18 (iv) of subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052.  
19 This section shall not apply to the possession of any controlled substance by a  
20 manufacturer, wholesaler, pharmacy, pharmacist, physician, podiatrist, dentist,  
21 optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse  
22 practitioner, or physician assistant, when in stock in containers correctly  
23 labeled with the name and address of the supplier or producer . . .

24 8. Health and Safety Code section 11170 states that no person shall prescribe,  
25 administer, or furnish a controlled substance for himself.

### 26 COST RECOVERY

27 9. Code section 125.3 provides, in pertinent part, that the Board may request  
28 the administrative law judge to direct a licensee found to have committed a violation or  
violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
and enforcement of the case.

### 29 CONTROLLED SUBSTANCE AT ISSUE

30 10. Cocaine is a Schedule II controlled substance as designated by Health and  
31 Safety Code section 11055, subdivision (b)(6).

### 32 FIRST CAUSE FOR DISCIPLINE

#### 33 (Criminal Conviction)

34 11. Respondent is subject to disciplinary action, for unprofessional conduct,  
35 pursuant to Code section 2761, subdivision (f), in that she was convicted of a crime which is

1 substantially related to the qualifications, functions, and duties of a registered nurse, as follows:  
2 On or about September 28, 2007, in the criminal proceeding titled *People of the State of Illinois*  
3 *v. Deborah A. Parnell* (Circuit Ct. of Cook County, 2007, No. 07128862301), Respondent was  
4 convicted by the Court on her plea of guilty to one misdemeanor count in violation of Criminal  
5 Code section 720 ILCS 5/16-2 (theft of mislaid property).

6 **SECOND CAUSE FOR DISCIPLINE**

7 **(Out-of-State Disciplinary Action/Denial of Licensure)**

8 . 12. Respondent is subject to disciplinary action, for unprofessional conduct,  
9 pursuant to Code section 2761, subdivision (a)(4), on the grounds that her licenses with the  
10 Colorado State Board of Nursing ("Colorado Board"), Michigan State Board of Nursing  
11 ("Michigan Board") and Illinois State Board of Nursing ("Illinois Board") were disciplined and  
12 Respondent was denied licensure by the Arizona State Board of Nursing ("Arizona Board"), as  
13 follows:

14 **Colorado State Board of Nursing**

15 a. On or about February 13, 1995, pursuant to the Final Agency Order of the  
16 Colorado Board, in the disciplinary proceeding titled *In the Disciplinary Proceedings Regarding*  
17 *the License to Practice Professional Nursing in the State of Colorado of Deborah Ann Parnell*,  
18 Respondent's registered nurse license was revoked based upon the Administrative Law Judge's  
19 Initial Decision of December 19, 1994, following Respondent's default. A true and correct copy  
20 of the Final Agency Order is attached as exhibit "A" and incorporated herein by reference. The  
21 disciplinary action was based, in part, upon the following:

22 1. In July 1990, Respondent was employed as a professional nurse at the  
23 Department of Veterans Affairs Medical Center ("VAMC") in Denver Colorado. On or about  
24 July 7, 1990, Respondent reported late for duty at VAMC. and appeared nervous, her hands were  
25 tremulous, her eyes were dilated, and she exhibited rapid speech and was slightly incoherent.  
26 When questioned by her supervisor, Respondent admitted that she had used crack/cocaine before  
27 coming to work and also admitted that she had used crack/cocaine for a long time and had been a  
28 recreational substance abuser. Respondent later denied her use of crack/cocaine before reporting

1 to duty.

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3           2.       The Colorado Board revoked Respondent's license for willfully or  
4 negligently acting in a manner inconsistent with the health or safety of persons under her care by  
5 using crack/cocaine prior to reporting for duty on July 7, 1990, and for negligently or willfully  
6 [practiced] nursing in a manner which fails to meet generally accepted standards for such nursing  
7 practice by using crack/cocaine prior to reporting for duty.

8                   **Arizona State Board of Nursing**

9           b.       On or about July 25, 2007, pursuant to the Order of Denial entered by the  
10 Arizona Board, in the proceeding titled *In the Matter of Application for License by: Deborah*  
11 *Ann Parnell; aka Deborah Ann Davis*, Respondent's application, submitted to the Arizona Board  
12 on or about May 1, 2006, for a registered nurse license was denied. A true and correct copy of  
13 the Order of Denial is attached as exhibit "B" and incorporated herein by reference. Pursuant to  
14 the Order of Denial, Respondent's application was denied based upon the following pertinent  
15 Findings of Fact:

16           1.       On or about May 1, 2006, Respondent failed to disclose her Colorado  
17 State nursing license under section number 12 entitled "License Information." On or about May  
18 5, 2006, Respondent told Arizona Board staff that she self-disclosed to her then nursing  
19 supervisor at the Veteran's Administration hospital in Colorado that she had been abusing an  
20 illegal substance, specifically crack cocaine. According to Respondent, the Colorado Board of  
21 Nursing reported her to the State of Illinois (Board of Registered Nursing).

22           2.       In light of the Findings of Fact stated above, the Arizona Board found  
23 cause to deny Respondent's application for licensure.

24                   **Illinois State Board of Nursing**

25           c.       On or about May 27, 2008, Respondent's registered nurse license was  
26 disciplined with a fine and reprimand based upon Respondent's discipline in the State of Arizona.

27                   **Michigan State Board of Nursing**

28           d.       On or about June 25, 2008, pursuant to the Consent Order and Stipulation

1 entered into between Respondent and the Michigan Board, in the disciplinary proceeding titled *In*  
2 *the Matter of: Deborah Ann Parnell, R.N.*, Respondent's registered nurse license was suspended  
3 for a period of six (6) months and one (1) day effective July 25, 2008. Respondent's license  
4 expired on March 31, 2008, prior to its suspension, and currently remains under suspended  
5 status. A true and correct copy of the Consent Order and Stipulation is attached as exhibit "C"  
6 and incorporated herein by reference. Pursuant to the Consent Order and Stipulation,  
7 Respondent admitted as follows:

8           1.     On February 13, 1995, Respondent's Colorado State Board of Nursing  
9 license was revoked based upon her admission of abusing crack cocaine.

10           2.     On August 18, 2003, Respondent filed an application for licensure with  
11 the Michigan Board and failed to disclose the disciplinary action taken against her Colorado  
12 license.

13           3.     On October 22, 2003, based, in part, on the representations made by  
14 Respondent in her application, Respondent was issued a license to practice as a registered nurse  
15 in the state of Michigan.

16           4.     On July 25, 2007, the Arizona Board denied Respondent's application for  
17 licensure based upon the revocation of her Colorado nursing license and failure to inform the  
18 Arizona Board of said revocation.

19           5.     Respondent failed to notify the Michigan Board of the disciplinary action  
20 by the Arizona Board within 30 days of the date of action.

21           6.     On August 7, 2007, Respondent tested positive for cocaine on a pre-  
22 employment drug screen regarding her employment with Nightingale Nurses Staffing Agency in  
23 Boca Raton, Florida.

24           7.     On August 13, 2007, Respondent's employment with Nightingale Nurses  
25 Staffing Agency was terminated based upon her positive drug screen, which was subsequently  
26 reported to the Michigan Board.

27           8.     On November 1, 2007, Respondent was referred to the Health Professional  
28 Recovery Program ("HPRP") for an evaluation and substance abuse monitoring.

1                   9.     On November 19, 2007, HPRP forwarded a letter to Respondent  
2 requesting that she complete intake by December 3, 2007.

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4                   10.    On December 6, 2007, HPRP forwarded Respondent a second request  
5 letter requesting that she contact HPRP by December 13, 2007, in order to complete intake.

6                   11.    On February 4, 2008, HPRP closed Respondent's file, due to her failure to  
7 respond to their requests that she complete intake, and forwarded it to the Michigan Board for  
8 disposition.

9                   12.    The conduct and circumstances described in subsections (c)(1) through  
10 (11) above constitute violations justifying suspension of Respondent's license.

11                               **THIRD CAUSE FOR DISCIPLINE**

12                               **(Procuring a License by Fraud, Misrepresentation, or Mistake)**

13                   13.    Respondent is subject to disciplinary action pursuant to Code Section  
14 2761, subdivision (b), in that she procured her California Registered Nurse License by fraud,  
15 misrepresentation, or mistake, as follows:

16                   a.     On or about November 30, 2005, Respondent submitted an Application for  
17 Licensure by Endorsement ("application") to the Board.

18                   b.     On or about November 1, 2005, Respondent certified, under penalty of  
19 perjury and with the understanding that providing false information or *omitting* required  
20 information was grounds for denial of licensure or license revocation in California, that all of the  
21 information provided in connection with the application was true, correct, and *complete*.

22                   c.     In the Professional Education ("education") section of the application,  
23 where Respondent was requested to, "List all states where you have ever held an RN license",  
24 she wrote in "Michigan." However, Respondent omitted that she had also previously held a  
25 license in Colorado.

26                   d.     Respondent was also asked, "Have you ever had disciplinary proceedings  
27 against any license as a RN or any health-care related license including revocation, suspension,  
28 probation, voluntary surrender, or any other proceeding in any state or country?" If yes, please

1 provide a detailed written explanation, including the date and state where the discipline  
2 occurred." Respondent marked the "Yes" box on the application and provided the Board with  
3 documentation from the State of Illinois Department of Professional Regulation evidencing  
4 discipline against her registered nurse license. However, Respondent failed to provide a detailed  
5 written explanation of the disciplinary action taken against her registered nurse license by the  
6 Colorado State Board of Nursing, as previously set forth in paragraph 12 (a), above.

7 **FOURTH CAUSE FOR DISCIPLINE**

8 **(Self-Administration of a Controlled Substance)**

9 14. Respondent is subject to disciplinary action pursuant to Code Section  
10 2761, subdivision (a), on the grounds of unprofessional conduct, as defined in Code section  
11 2762, subdivision (a), in that she self-administered the controlled substance Cocaine without  
12 lawful authority therefor, as further set forth in subparagraphs 12 (c), above.

13 **PRAYER**

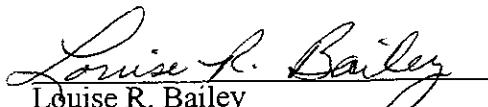
14 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
15 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

16 1. Revoking or suspending Registered Nurse License Number 674904 issued  
17 to Deborah Ann Parnell, also known as Deborah A. Parnell, Deborah Parnell, and Deborah Ann  
18 Davis;

19 2. Ordering Deborah Ann Parnell, also known as Deborah A. Parnell,  
20 Deborah Parnell, and Deborah Ann Davis, to pay the Board of Registered Nursing the reasonable  
21 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
22 Code section 125.3; and

23 3. Taking such other and further action as deemed necessary and proper.

24 DATED: 10/26/09

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27 Louise R. Bailey  
28 Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs

State of California  
Complainant

03579110SA2008307136  
Parnell.wpd

**EXHIBIT "A"**

**COLORADO STATE BOARD OF NURSING**



**EXHIBIT "A"**

**COLORADO STATE BOARD OF NURSING**

**FINAL AGENCY ORDER**

BEFORE THE STATE BOARD OF NURSING

STATE OF COLORADO

Case No. NB 94-75

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FINAL AGENCY ORDER

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IN THE MATTER OF DISCIPLINARY PROCEEDINGS REGARDING THE LICENSE  
TO PRACTICE PROFESSIONAL NURSING IN THE STATE OF COLORADO OF  
DEBORAH ANN PARNELL, R.N., LICENSE NO. 94502,

Respondent.

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The Colorado State Board of Nursing (the "Board"), pursuant to and after formal proceedings before a duly qualified Administrative Law Judge ("ALJ") in accordance with the provisions of the Nurse Practice Act and the Administrative Procedure Act, and having reviewed the ALJ's Initial Decision, hereby enters the following findings and order:


1. Deborah Ann Parnell, R.N., ("respondent") was served with a Notice of Duty to Answer, Notice to Set, Notice of Hearing, and Notice of Charges on October 12, 1994, to all last known addresses on file with the Board. Respondent failed to answer the Notice of Charges in this matter.
2. The Board's Motion For Entry of Default was mailed by first class mail to Respondent to all last known addresses of record on file with the Board on November 21, 1994. The Administrative Law Judge's Entry of Default was mailed to Respondent to all last known addresses of record on December 6, 1994. Respondent did not file a motion to set aside the Entry of Default.
3. Pursuant to §24-4-105 (2)(b), C.R.S. (1993), the Initial Decision Upon Default was rendered on December 19, 1994, and transmitted to the Board. The Initial Decision Upon Default is incorporated herein by reference.
4. The Initial Decision Upon Default was served on the respondent and the Board's counsel on January 4, 1995.
5. Exceptions to the Initial Decision Upon Default were due on February 3, 1995.
6. As of February 8, 1995, no exceptions were filed by

7. Pursuant to § 24-4-105(14), C.R.S. (1988 & 1993 Supp.), and policy of the Board, the Initial Decision Upon Default of the AJJ has become the final order of the agency.

IT IS THEREFORE ORDERED by the Board, based upon the above findings: that the license to practice professional nursing of Deborah Ann Parnell is hereby revoked.

DATED this 13<sup>th</sup> day of February 1995.

BY THE BOARD OF NURSING:

  
KAREN D. BRUMLEY, R.N.  
Program Administrator

**BEFORE THE STATE BOARD OF NURSING  
STATE OF COLORADO**

**CASE NO. NB 94-75**

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**INITIAL DECISION**

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**IN THE MATTER OF DISCIPLINARY PROCEEDINGS REGARDING THE LICENSE TO  
PRACTICE PROFESSIONAL NURSING IN THE STATE OF COLORADO OF DEBORAH  
ANN PARNELL, R.N., LICENSE NO. 94502,**

**Respondent.**

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This case is a disciplinary proceeding before the State Board of Nursing ("Board") involving the license of Respondent to practice as a professional nurse. The Board was represented by Darlene H. Harney, Assistant Attorney General. Respondent did not appear in this proceeding. Based upon Respondent's failure to file a timely answer, an Entry of Default was issued on December 6, 1994. Respondent then had ten days to show good cause why the default should be set aside. Section 24-4-105(2)(b), C.R.S. (1994). No motion to set aside the default was filed, and this matter became ready for a decision on December 19, 1994.

**FINDINGS OF FACT**

1. The last address furnished by Respondent to the Board is 799 Dahlia, Apt. 208, Denver, Colorado 80220.
2. Notice of the nature of this proceeding, the legal authority and jurisdiction under which it was held and the matters of fact and law asserted was mailed by first class mail to Respondent at the above address on October 12, 1994.
3. The Board's Motion for Entry of Default was mailed by first class mail to Respondent at the above address on November 21, 1994.
4. The Administrative Law Judge's Entry of Default was mailed to Respondent by first class mail to the above address on December 6, 1994.

5. Respondent was licensed to practice as a professional nurse in Colorado on November 1, 1990, and was so licensed at all times relevant to this proceeding. Respondent's license has currently lapsed.

6. In July, 1990, Respondent was employed as a professional nurse at the Department of Veterans Affairs Medical Center ("VAMC"), in Denver, Colorado.

7. On or about July 7, 1990, Respondent reported late for duty at VAMC.

8. Respondent was nervous, her hands were tremulous, her eyes were dilated, and she exhibited rapid speech and was slightly incoherent.

9. When questioned by her supervisor, Respondent admitted that she had used crack/cocaine before coming to work.

10. Respondent also admitted that she had used crack/cocaine for a long time and had been a recreational substance-abuser.

11. Since being confronted by her VAMC supervisor on July 7, 1990, Respondent has alternately admitted and vehemently denied her use of crack/cocaine before reporting to duty.

12. Generally accepted standards of practice prohibit the use of mind-altering drugs such as crack/cocaine. By using crack/cocaine before she reported for duty at VAMC on July 7, 1990, Respondent failed to meet these generally accepted standards of practice.

13. The use of mind altering drugs such as crack/cocaine dulls the senses and can distort perceptions. Nurses who use such drugs may thus have an impaired ability accurately to assess a patient's condition and are susceptible to forgetfulness, which may lead to an omission of care. Nurses are charged with the accurate dosage, administration and dispensing of drugs, which require a high degree of attentiveness. The use of drugs can compromise this attentiveness. Respondent's reporting for work on July 7, 1990, after using crack/cocaine was thus inconsistent with the health or safety of persons under her care.

14. As a professional nurse, Respondent should reasonably have been aware of the fact that the use of crack/cocaine could compromise her ability to provide safe and effective care for her patients, as reflected in the prior paragraph.

## CONCLUSIONS OF LAW

1. Respondent has received timely notice of the time, place and nature of this hearing; of all matters of fact and law asserted; and of all matters required by Section 24-4-105(2)(a), C.R.S. (1994), in the manner required by that section.
2. The Board has jurisdiction over Respondent and over her license as a professional nurse. The Board has jurisdiction over Respondent's lapsed license pursuant to Section 12-38-117(4), C.R.S. (1991). This section permits the renewal of a license summarily suspended by operation of law for failure to renew in a timely manner.
3. Respondent is subject to discipline pursuant to Section 12-38-117(1)(c), C.R.S. (1985 and 1991), in that she "willfully or negligently acted in a manner inconsistent with the health or safety of persons under [her] care" by using crack/cocaine prior to reporting for duty on July 7, 1990.
4. Respondent is subject to discipline pursuant to Section 12-38-117(1)(f), C.R.S. (1985 and 1991), in that she "negligently or willfully acted nursing in a manner which fails to meet generally accepted standards for such nursing practice" by using crack/cocaine prior to reporting to duty.

## INITIAL DECISION

Upon finding a violation of Section 12-38-117(1), C.R.S., the Administrative Law Judge must then determine the appropriate sanction to be imposed. Sanctions include possible revocation, suspension, probation, or the issuance of a letter of admonition. Section 12-38-117(1), C.R.S. (1991). The Board in this case seeks revocation of Respondent's license.

The violations of the Nurse Practice Act established in this matter arise from a single occasion on which Respondent reported for duty after using crack/cocaine such that she was nervous, her hands trembled, her eyes were dilated, and her speech was rapid and slightly incoherent. Despite the one-time nature of this conduct, Respondent's conduct is of an extremely serious nature. Before reporting to work, Respondent used controlled substances which as a nurse she reasonably should have known could compromise her ability to provide safe and effective care for her patients. Respondent has not fully accepted responsibility for her conduct, as evidenced by her alternate admissions and denials of her use of drugs. Under these circumstances, it is apparent that Respondent's continued practice as a professional nurse would subject her patients to

potential danger. Respondent has further evidenced a disinterest in her continued licensure by allowing her license to lapse and by failing to participate in this proceeding.

It is therefore the Initial Decision of the Administrative Law Judge that Respondent's license to practice as a professional nurse in Colorado is revoked.

The hearing in this matter scheduled for March 2, 1995, is vacated.

DATED AT: Denver, Colorado  
December 19, 1994.

Nancy Connick  
NANCY CONNICK  
Administrative Law Judge

nb9475.def/pb



**EXHIBIT "B"**  
**ARIZONA STATE BOARD OF NURSING**  
**ORDER OF DENIAL**

**BEFORE THE ARIZONA STATE BOARD OF NURSING**

IN THE MATTER OF APPLICATION )  
FOR LICENSE BY: )  
DEBORAH ANN PARNELL; AKA DEBORAH )  
ANN DAVIS )  
TO PRACTICE PROFESSIONAL )  
NURSING IN THE STATE OF ARIZONA )

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**ORDER OF DENIAL**  
**NO. 0605049**

On July 25, 2007, the Arizona State Board of Nursing ("Board") considered the application for licensure of DEBORAH ANN PARNELL; AKA DEBORAH ANN DAVIS, ("Applicant").

**FINDINGS OF FACT**

1. On or about May 1, 2006, Applicant submitted a professional nurse application by endorsement to the Board.
2. On or about May 1, 2006, Applicant failed to disclose her Colorado State Nursing license under section number 12 entitled "License Information."
3. On or about May 2, 2006, the Board received a NURSUS report indicating that on or about February 13, 1995, Applicant professional nurse license was revoked by default after she failed to respond to Notice of Charges mailed to her address of record.
4. On or about May 5, 2006, during an interview with S. Smith, CANDO Consultant, Applicant asserted she was not aware that her Colorado license had been revoked.

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5. On or about May 5, 2006, Applicant told Board staff she self-disclosed to her then nursing supervisor at the VA Hospital in Colorado that she been abusing an illegal substance, specifically crack cocaine. According to Applicant, the Colorado Board of Nursing reported her to the State of Illinois.

6. On or about May 5, 2006, Applicant asserted that she was actively working with the Colorado Board of Nursing to re-instate her professional nurse license.

7. On or about June 6, 2006, during an interview with Board staff, Applicant was informed that her application was under investigation for past disciplinary action by other regulatory agencies and a positive criminal history.

8. On or about June 6, 2006, Applicant told Board staff that she "...just completed my fingerprinting for CA (Board of Registered Nurses) and they didn't find anything wrong and licensed me." Board staff asked Applicant if she had ever been charged, arrested, or appeared in court on any criminal charges, including DUI and she stated, "No, absolutely no. I've never been arrested or charged."

9. On or about June 14, 2006, Applicant said she recalled only one incident occurring in either 1997 or 1999 when she received three tickets by the Chicago Police Department for failing to stop her car at an intersection. Applicant asserted that the police officer cited her for imprudent driving and failing to stop. Applicant then recalled that the police officer was "...giving her a hard time.." and alleged that she tried to hit him with the tickets he had given her. Applicant agreed to provide the Board with police and court documents supporting her explanation.

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10. On or about June 11, 2007, Applicant failed to provide the Board with any police or court records relating to a July 19, 1998 charge of "Battery/Cause Bodily Harm" by the Chicago Police Department, Chicago, IL.

### **CONCLUSIONS OF LAW**

In light of the above Findings of Fact, the Board has cause to deny the application for licensure of DEBORAH ANN PARNELL; AKA DEBORAH ANN DAVIS, pursuant to A.R.S. § 32-1663(A) and (B), as defined in A.R.S. § 32-1601(16)(a), (d), (f), and (g) and A.A.C. R4-19-403(1), (17), (18), (20), (25)(a) and (31). (Adoptive and effective November 12, 2005).

### **ORDER**

NOW THEREFORE, IT IS ORDERED that the application of DEBORAH ANN PARNELL; AKA DEBORAH ANN DAVIS, for a license to practice as a professional nurse in the State of Arizona is denied.

IT IS FURTHER ORDERED that Applicant is not eligible to apply for reinstatement of said license pursuant to A.A.C. R4-19-404 for at minimum, five (5) years.

IT IS FURTHER ORDERED that Applicant is not eligible to practice nursing in Arizona under the privilege of any Compact state without prior approval from the Arizona Board of Nursing.

PURSUANT TO A.R.S. § 41-1092.03, any person aggrieved by this Order may apply to the Board, in writing, within thirty days of receipt and request a public hearing with respect to this Order. If you request a public hearing with respect to this order, you also have the right to request an informal settlement conference by filing a written request with the Board, pursuant to A.R.S. § 41-1092.06, no later than twenty (20) days before the scheduled hearing. The conference will be held within fifteen (15) days after receipt of your request. Please note

that you waive any right to object to the participation of the Board's representative in the final administrative decision of the matter if it is not settled at the conference. For answers to questions regarding the appeals process, contact Susan Barber, at (602) 889-5161.

DATED this 25<sup>th</sup> day of July, 2007.

ARIZONA STATE BOARD OF NURSING

SEAL



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Joey Ridenour, R.N., M.N.  
Executive Director

JR/mer:ts

COPY mailed this 31<sup>st</sup> day of July, 2007, by First Class Mail and Certified Mail No. 70011940000345114602 to:

DEBORAH ANN PARNELL  
3226 CHESTNUT DRIVE  
FLOSSMOOR, IL 60422

By: Trina Smith  
Legal Secretary



**EXHIBIT "C"**  
**MICHIGAN STATE BOARD OF NURSING**  
**CONSENT ORDER AND STIPULATION**

STATE OF MICHIGAN  
DEPARTMENT OF COMMUNITY HEALTH  
BUREAU OF HEALTH PROFESSIONS  
BOARD OF NURSING  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

DEBORAH ANN PARNELL, R.N.  
License Number: 47-04-129224  
Formerly Listed As: 47-04-241711

File Number: 47-08-107643  
CONSENT ORDER AND STIPULATION

CONSENT ORDER

WHEREAS, an Administrative Complaint, hereafter Complaint, was issued on March 6, 2008, charging Deborah Ann Parnell, R.N., hereafter Respondent, with having violated sections 16221(a), 16221(b)(ii), 16221(b)(iii), 16221(b)(vi), 16221(b)(x), 16221(c)(i) and 16221(i) of the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; and

WHEREAS, Respondent, has admitted by Stipulation submitted herewith, that the facts alleged in the Complaint are true and constitute violations of the Public Health Code; and

WHEREAS, the Disciplinary Subcommittee of the Michigan Board of Nursing, hereafter Disciplinary Subcommittee, has reviewed the Stipulation and, based upon the matters asserted therein, agrees that the public interest is best served by resolution of the outstanding Complaint; now therefore,

STATE OF MICHIGAN-INGHAM COUNTY  
We certify that the foregoing is a true  
copy of the original on file in the office  
of the Department of Community Health  
Bureau of Health Professions

IT IS HEREBY FOUND that the allegations of fact and law set forth in the Complaint are true and constitute violations of sections 16221(a), 16221(b)(ii), 16221(b)(iii), 16221(b)(vi), 16221(b)(x), 16221(c)(i) and 16221(l) of the Public Health Code, supra.

Accordingly,

IT IS HEREBY ORDERED that for the aforesaid violations of the Public Health Code, Respondent's license to practice as a registered nurse in the state of Michigan is SUSPENDED for a minimum period of six months and one day, commencing on the effective date of this Order.

IT IS FURTHER ORDERED that reinstatement of a license which has been suspended for more than six months is not automatic and, in the event Respondent applies for reinstatement of the license, application for reinstatement may be made not sooner than 90 days prior to the end of the suspension period and shall be in accordance with sections 16245 and 16247 of the Public Health Code, supra. Further, in support of the application for reinstatement, Respondent shall supply clear and convincing evidence to the Michigan Board of Nursing, hereafter Board, that Respondent is of good moral character, is able to practice the profession with reasonable skill and safety, that it is in the public interest for Respondent to resume practice, and that Respondent has met the guidelines on reinstatement adopted by the Department.

IT IS FURTHER ORDERED that in the event Respondent violates any provision of this Order, and if such violation is deemed to constitute an independent

violation of the Public Health Code or the rules promulgated thereunder, the Disciplinary Subcommittee may proceed to take disciplinary action pursuant to 1996 AACRS, R 338.1632 and section 16221(h) of the Public Health Code, supra.

IT IS FURTHER ORDERED that this Order shall be effective 30 days from the date signed by the Disciplinary Subcommittee, as set forth below.

Dated: 6/25/08

MICHIGAN BOARD OF NURSING

By Michelle Woods  
Chairperson, Disciplinary Subcommittee

STIPULATION

1. The allegations of fact and law contained in the Complaint dated March 6, 2008, are true and constitute violations of sections 16221(a), 16221(b)(ii), 16221(b)(iii), 16221(b)(vi), 16221(b)(x), 16221(c)(i) and 16221(i) of the Public Health Code, supra.

2. Respondent understands and intends that by signing this Stipulation Respondent is waiving the right, pursuant to the Public Health Code, the rules promulgated thereunder, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq, to require the Department to prove the charges set forth in the

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Complaint by presentation of evidence and legal authority, and to appear with an attorney and such witnesses as Respondent may desire to present a defense to said charges.

3. Michelle M. Johnson, R.N., M.S.N., a member of the Board who supports this proposal, and the Department's representative are both free to discuss this matter with the Disciplinary Subcommittee and recommend acceptance of the resolution set forth in the foregoing Consent Order.

4. The foregoing Consent Order is approved as to form and substance by Respondent and the Department and may be entered as the final order of the Disciplinary Subcommittee in said cause.

5. The foregoing proposal is conditioned upon acceptance by the Disciplinary Subcommittee, Respondent and the Department expressly reserving the right to further proceedings without prejudice should the Consent Order be rejected.

AGREED TO BY:

AGREED TO BY:

Melanie B. Brim 5/14/08

Melanie B. Brim, Director  
Bureau of Health Professions  
Department of Community Health

Dated: 05-08-2008

Deborah A. Parnell RD

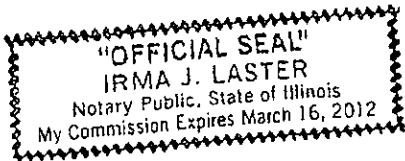
Deborah Ann Parnell, R.N.  
Respondent

Dated: 5/8/2008

State of Illinois )  
County of COOK ) ss

On the 8th day of May, 2008, before me, a Notary Public in and for said county, appeared Deborah Ann Parnell, R.N., who, upon oath, stated that she has

read the foregoing Consent Order and Stipulation by her subscribed, that she knows the contents thereof to be true, and that the signing of said Consent Order and Stipulation is her free act and deed.



Irma J. Laster  
Notary Public, COOK County  
State of Illinois  
My Commission expires March 16, 2012

This is the last and final page of a Consent Order and Stipulation in the matter of Deborah Ann Parnell, R.N., File Number 47-08-107643, before the Disciplinary Subcommittee of the Michigan Board of Nursing, consisting of five pages, this page included.

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